

REMARKS/ARGUMENTS

No claim amendments are made with this request for reconsideration. Reconsideration of the prior art rejections is respectfully requested.

Claims 2, 4-11, 19, 20 and 24 stand rejected as being unpatentable in over Lekeux (US 6,191,512) in view of Tamura (US 6,819,019).

The primary reference is Lekeux (US 6,191,512), in which an open plug-in module can be inserted into an interface. However, the spaced-apart walls of the interface of the drive unit are not rectangular but triangular. This interface therefore forms only a single opening with a single opening direction (perpendicular to the opening face). This does not in any way suggest to a person skilled in the art that he should form an interface which has two adjacent openings into which something can be inserted or out of which something can project, in principle, in two directions. Furthermore, Lekeux points away from forming a sealing face on the inner face of the walls of the interface in order to form a radial seal with the plug-in module. **In Lekeux, the sealing face is in the form of a flange** in which the seal of the electronics module in the direction of insertion is pressed against the interface **axially to the direction of insertion** by means of the guides. The geometric design of such a diagonal sealing plane of Lekeux is **not compatible with the design of a sealing face, which sealing face seals radially to the direction of insertion, on the inner wall (that is to say so as to seal perpendicular to the insertion direction!)** of the electronics interface. Therefore, the subject matter of independent claim 19 is not suggested by Lekeux.

Tamura (US 6,819,019) does not cure the deficiencies of Lekeux. Tamura discloses a casing 6 that includes a connecting opening part O and a communicating part H. The connecting opening part O includes a rectangular-tube-like projecting piece part 7e (col. 5, lines 25-30), and the communicating part H is formed by cutting off the circular-arc-like piece part 10a, to permit detection of a rotational state of the sensor magnet 11 (col. 7, lines 4-13). The openings formed by the connecting opening part O and the communicating part H are separate and distinct openings, see Fig. 8. Specifically, Tamura does not teach or suggest that the walls are

approximately rectangular and form an opening perpendicular to and an opening axial to the armature shaft, and the openings are connected to one another **and form a common opening with radial and axial opening directions**, among other things, as required by independent claim 19.

Lekeux and Tamura, either alone or in combination do not teach or suggest the subject matter of independent claim 19. Claims 2, 4-11 and 20 depend from claim 19 and are allowable for these and other independent reasons. Reconsideration and withdrawal of the rejection is respectfully requested.

With respect to claim 24, as discussed above with respect to claim 19, Lekeux and Tamura, either alone or in combination do not teach or suggest that the walls are **approximately rectangular** and form an opening perpendicular to and an opening axial to the armature shaft, and the openings are connected to one another **and form a common opening with radial and axial opening directions**, among other things, as required by independent claim 24.

Lekeux discloses a complementary part 5b that has a plane P that seals against complementary part 5a by means of gasket 12. Lekeux further includes an envelope extending from the complementary part 5b in a direction skew to the plane P. Lekeux does not disclose a plug-in module that has **two outer walls which are arranged at an angle to one another and can close off openings, which are connected to one another and have different opening directions, and the two outer walls are additionally connected to one another by means of an L-shaped frame element** in such a way that both the printed circuit board and also connections of the electronic connector are freely accessible in order to be mounted, as required by claim 24 (see lines 18 and on of claim 24).

The plug-in module of Lekeux does not have a radial seal in relation to the insertion direction and this is not suggested in the case of this flange seal either. Furthermore, the plug-in module of Lekeux does not have outer walls which are arranged at an angle to one another and are suitable for closing off two openings, which are connected to one another and have different opening directions, in a water-tight manner. In the Office action, reference symbol 5b of Lekeux is

interpreted as being the frame element, but in the description this designates the entire housing of the insert part. As stated above, the plug-in module of Lekeux is suitable only for closing an opening of an interface with one opening direction. If it were assumed in Lekeux that the two side faces of the plug-in module are outer walls which are arranged at an angle to one another and against the ends of which the printed circuit board 6 rests, these two outer walls are additionally connected to one another by two further opposite, triangular outer walls. This has the disadvantage that the printed circuit board is not freely accessible for mounting purposes perpendicular to the insertion direction since it is pushed too far into the housing (triangular side walls) which comprises the printed circuit board. Therefore, the connections of the electronics connector are likewise not freely accessible in the region of the printed circuit board for mounting of the connections on the printed circuit board.

However, according to the invention specified in independent claim 21, two outer walls which are arranged at an angle to one another by means of an L-shaped frame are connected to one another in such a way that no further side walls of the plug-in module inhibit mounting of the printed circuit board or mounting of the connections of the electronics connector on the printed circuit board. The side walls of the plug-in module can be dispensed with by virtue of stabilization by means of the L-shaped frame element, as a result of which the printed circuit board, as described in claim 17, can be pressed onto the ends of the connector pin 100 transverse to the insertion direction by means of press-fit technology. This constitutes a considerable mounting advantage since the design of the plug-in module as per Lekeux makes it considerably more difficult to make contact with the printed circuit board. Neither Lekeux nor the other references suggest to a person skilled in the art that he could connect the outer walls (which are arranged at an angle to one another) to one another by means of an L-shaped frame element in such a way that the printed circuit board is freely accessible for mounting the connections. The subject matter of new claim 21 is therefore not suggested by the cited references.

Tamura does not cure the deficiencies of Lekeux. Specifically, Tamura does not teach or suggest, nor does the Examiner allege that Tamura teaches or suggests, a plug-in module has **two outer walls which are arranged at an angle to one another and can close off openings, which are connected to one another and have different opening directions, and the two outer walls are**

additionally connected to one another by means of an L-shaped frame element in such a way that both the printed circuit board and also connections of the electronic connector are freely accessible in order to be mounted, as required by claim 24.

Lekeux and Tamura, either alone or in combination do not teach or suggest the subject matter of independent claim 24. Reconsideration and withdrawal of the rejection is respectfully requested.

Claims 13-16 and 21-23 stand rejected as being unpatentable over Tamura in view of Lekeux.

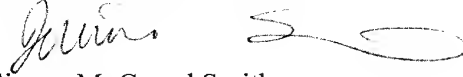
With respect to claim 21, Tamura does not teach or suggest, nor does the Examiner allege that Tamura teaches or suggests a plug-in module has **two outer walls which are arranged at an angle to one another and can close off openings, which are connected to one another and have different opening directions, and the two outer walls are additionally connected to one another by means of an L-shaped frame element** in such a way that both the printed circuit board and also connections of the electronic connector are freely accessible in order to be mounted, as required by claim 21.

Lekeux does not cure the deficiencies of Tamura. Specifically, and as discussed above with respect to claim 24, Lekeux does not teach or suggest a plug-in module has **two outer walls which are arranged at an angle to one another and can close off openings, which are connected to one another and have different opening directions, and the two outer walls are additionally connected to one another by means of an L-shaped frame element** in such a way that both the printed circuit board and also connections of the electronic connector are freely accessible in order to be mounted, as required by claim 21.

Tamura and Lekeux, either alone or in combination do not teach or suggest the subject matter of independent claim 21. Claims 13-16, 22 and 23 depend from claim 21 and are allowable for these and other independent reasons. Reconsideration and withdrawal of the rejection is respectfully requested.

In view of the foregoing, reconsideration of the rejection and allowance of claims 1, 2, 4-11, 13-16 and 19-24 are respectfully requested.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Julianne M. Cozad Smith', followed by a long, horizontal, looping flourish.

Julianne M. Cozad Smith

Reg. No. 62,174

Docket No.: 022862-1065-00
Michael Best & Friedrich LLP
100 East Wisconsin Avenue
Suite 3300
Milwaukee, Wisconsin 53202-4108
414.271.6560